Before the FEDERAL COMMUNICATIONS COMMISSION 20554

Washington, D.C.

In re	Applications	of))	MM Docket No. 91-10
WHITE	BROADCASTING	PARTNERSHIP))) 1	File No. BPH-891214MM

For Construction Permit for a New FM Station Station on Channel 289A in Baldwin, Florida

RECEIVED

Hon. Edward Luton, Administrative Law Judge

SEP 1 3 1991

Federal Communications Commission Office of the Secretary

JOINT MOTION TO REOPEN THE RECORD

Charles Cecil White and Dianna White d/b/a White Broadcasting Partnership; Douglas Johnson; Peaches Broadcasting, Ltd.; and Northeast Florida Broadcasting Corp. ("Joint Movants") by their respective attorneys, respectfully move for (1) the reopening of the record; (2) the identification of the attached one page document entitled "Joint Stipulation as to Media Interests of Robin Rothschild" as Joint Exhibit #1; (3) the acceptance of the attached Joint Exhibit 1; and (4) the reclosure of the record.

Joint Exhibit 1 is a stipulation of all applicants except JEM Productions, Limited Partnership ("JEM") concerning the media interests of Robin Rothschild, a former limited partner in JEM.1/The Joint Movants note that a review of the hearing record reveals that it does not contain any reference to Ms. Rothschild's media interests. An identification of those interests will be necessary in order for each party to prepare findings and conclusions and for the Presiding Judge to prepare an Initial Decision.

^{1/} JEM was provided with a draft of this Joint Motion and was was invited to join in it. JEM has declined to do so.

Respectfully submitted,

Charles C. White /dh

Charles Cecil White and Dianna White d/b/a White Broadcasting Partnership 707 Newport Street Macclenny, FL 32063

arthur Belendiuk / 8h

Arthur Belendiuk Smithwick & Belendiuk 2033 M Street N.W. Washington, D.C. 20036 (202) 785-2800 Counsel for Douglas Johnson

David Honig

1800 N.W. 187th Street Miami, Florida 33056 (305) 628-3600

Counsel for Peaches Broadcasting, Ltd.

Jamas Winstonldh

James Winston
Rubin, Winston, Diercks & Harris
1730 M Street N.W., Suite 412
Washington, D.C. 20036
(202) 861-0870
Counsel for Northeast Florida
Broadcasting Corp.

September 13, 1991

JOINT STIPULATION AS TO MEDIA INTERESTS OF ROBIN ROTHSCHILD

Robin Rothschild was a 40% limited partner in JEM

Productions, Limited Partnership ("JEM") from the time JEM filed

its application until February 26, 1991. On that date, Ms.

Rothschild's interest was assigned to Atlantic-Pacific

Broadcasting, Inc., ("Atlantic-Pacific"), a Delaware corporation,

100% of whose stock was owned by Ms. Rothschild. On May 2, 1991,

Atlantic-Pacific ceased to be a limited partner in JEM.

Throughout the time Ms. Rothschild or Atlantic Pacific was a limited partner in JEM, Ms. Rothschild held an 89% voting equity interest in Rothschild Broadcasting, Inc., licensee of WVAY-FM, Wilmington, Vermont.

At various times while she or Atlantic-Pacific was a limited partner in JEM, Ms. Rothschild also held equity interests in four FM construction permit applicants besides JEM. None of these applicants was awarded a construction permit during the time Ms. Rothschild or Atlantic-Pacific was a limited partner in JEM.

CERTIFICATE OF SERVICE

I, David Honig, this 13th day of September, 1991, hereby certify that I have caused to be placed in U.S. First Class Mail, postage prepaid, the foregoing "Joint Motion to Reopen the Record" addressed to the following:

Hon. Edward Luton
Administrative Law Judge
Federal Communications
Commission
2000 L Street N.W.
Washington, D.C. 20554

Y. Paulette Laden, Esq. FCC Hearing Branch 2025 M Street N.W. #7212 Washington, D.C. 20554

Charles Cecil White and Dianna White d/b/a White Broadcasting Partnership 707 Newport Street Macclenny, FL 32063

Arthur V. Belendiuk, Esq. Smithwick & Belendiuk 2033 M Street N.W. Washington, D.C. 20036 Counsel for Johnson

James L. Winston, Esq. Rubin Winston & Diercks 1730 M St. N.W. #412 Washington, D.C. 20036 Counsel for Northeast Avelino G. Halagao, Esq. 7799 Leesburg Pike #900 Falls Church, VA 22043 Counsel for JEM

David Honig